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July 10, 2002

RECEIVED

JUL 10 2002

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VIA HAND DELIVERY

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

EX PARTE OR LATE FILED

Re: Notice of Permitted *Ex Parte* Presentation in CC Docket No. 02-148; Application of Qwest Communications International, Inc. To Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota

Dear Ms. Dortch:

On behalf of Qwest Communications International, Inc. ("Qwest"), submitted herewith pursuant to Section 1.1206(b) of the Commission's rules are an original and two copies of this notice regarding a permitted *ex parte* presentation in the above-captioned proceeding. On July 8, 2002, Qwest met with the staff of the Department of Justice regarding various issues pertaining to Qwest's pending Section 271 application. The attached document covers the issues discussed at the meeting.

Sincerely,

Peter D. Shields

cc: Michael Carowitz
Elizabeth Yokus
Katherine Brown

No. of Copies 014
Date

**DOJ EX PARTE
JULY 8, 2002
SECTION 271
APPLICATIONS FOR
COLORADO, IDAHO,
IOWA, NORTH DAKOTA,
NEBRASKA**

Question:

Provide more detail and support for the assertion that CLEC bills for UNE-P are auditable.

Answer:

Qwest's Wholesale bill formats are described in the Declaration of Lynn M. V. Notarianni and Christie L. Doherty, Operations Support Systems ("OSS Declaration").¹ Here we give further detail regarding the ability of CLECs to audit Wholesale bills for UNE-P today, including Wholesale bills provided in the Billing Output Specification ("BOS") format.²

It is worth noting at the outset that at no time during the many state workshops leading to Qwest's 271 application did a CLEC contend that Qwest's Wholesale bills are not auditable. Qwest fully meets the requirements of Section 271 in this area.

A. Bills Generated by CRIS Are Available in BOS Format

As explained in the OSS Declaration, Qwest uses the same system for billing Resale and UNE-P – CRIS – that it uses in the Retail context.³ In response to an expressed interest by CLECs to receive bills in a format other than the one CRIS provides, Qwest recently began to provide CLECs with the option of receiving UNE-P bills in a BOS format. Qwest notified CLECs on April 19, 2002, that it would provide UNE-P bills in BOS format with a target production date as of July 1, 2002.⁴ Qwest's April 19th notification was included in Appendix O, Volume 2 (1192.doc) of its Application, and also is provided here in Attachment 1. This BOS format billing option was reaffirmed in paragraph 498 of the OSS Declaration.

Bills generated through CRIS that are delivered to CLECs in a BOS format are compatible with the mechanized systems that certain carriers already have in

¹ See Consolidated Application for Authority to Provide In-Region, InterLATA Services in Colorado, Idaho, Iowa, Nebraska and North Dakota, WC Docket No. 02-148, filed June 13, 2002, ("Application") at Attachment 5, Appendix A.

² The BOS format is provided in the following media: NDM; Web access; Diskette; and BDT. See OSS Declaration at ¶ 498. Some CLECs refer to the BOS format as "BOS-BDT" or Carrier Access Billing System ("CABS").

³ See *id.* at ¶ 491.

⁴ However, the only CLEC who has requested BOS format bills to date began the testing process June 1, 2002.

place to handle CABS bills. CLECs whose systems are not already set-up to accommodate the BOS format are more likely to prefer receiving CRIS bills in ASCII or EDI format.

Although the option of receiving CRIS bills in a BOS format was offered April 19, 2002, only one CLEC has asked to receive its (UNE-P POTS) bills in a BOS format to date.

B. Qwest Wholesale Bills Are Auditable

Qwest fully satisfies the FCC requirement that it “provide a wholesale bill that is ‘readable, auditable and accurate’ to satisfy its checklist obligations.”⁵ As explained in the OSS Declaration, Qwest provides Wholesale bills to CLECs in various formats.⁶ These bills contain both summary level information and detailed information specific to each end-user level sub account.⁷ The level of detail on these bills provides CLEC recipients with the information necessary to audit the bills for accuracy.

Charges for telecommunications service break down into three major types: (1) Monthly Recurring Charges; (2) Non-recurring and Fractional Charges (sometimes called “Other Charges & Credits,” or “OCC”); and (3) Usage Charges. As explained more fully below, Qwest bills are fully auditable for all three types of charges.

1. Monthly Recurring Charges

Qwest’s CRIS and BOS bill formats provide monthly services information necessary for purposes of verification.

Every CRIS Summary Bill, whether electronic or paper, contains a “Summary of Services” section that lists the total number of all the services billed in a given billing period.⁸ For example, in Attachment 2 – which is an actual Colorado bill (the name and account number have been changed) – there were 73 Anonymous Caller Rejection Services (USOC AYK) billed; 36 Directory Listings (USOC CLT) billed; three 3-Way Call Transfers billed (USOC EO3), and so forth, in the billing period. Every billed USOC, regardless of sub account, is included here.

⁵ See *New Jersey 271 Order* at ¶ 124, citing *Pennsylvania 271 Order* at ¶ 22.

⁶ See OSS Declaration at ¶ 498.

⁷ See *id.* at ¶¶ 494-495.

⁸ As explained in the OSS Declaration, “[f]or each state in which Qwest does business, CRIS provides CLECs with a Summary Bill for Resale products and/or a Summary Bill for each UNE product.” See *id.* at ¶ 494.

This aggregation of information enables CLECs to validate at a summary level that their USOC quantities are correct.

To validate that monthly services are being billed correctly, a CLEC would begin by comparing the USOC quantity in the Summary of Service section of the Summary Bill (Attachment 2) to the USOC quantity the CLEC expected to see in its own records. If the USOC quantities matched, this would confirm the bill's accuracy. If the USOC quantities did not match, the CLEC could mechanically or manually look in the Itemized Service section of its sub-accounts and determine whether the service that was billed should in fact have been billed.

At the sub-account level, Qwest provides itemization of each monthly service billed for that particular sub-account. As is clear from Attachment 3, a CLEC can validate a particular sub-account by going to the "Itemized Service" section of that sub-account's page in the bill. The Itemized Service section provides a plain English description of each monthly service item billed for that sub-account and the rate for that service. This provides CLECs with the information they need to audit the monthly services billed for each sub-account.

The electronic bills can be loaded into publicly available software to mechanize their validation steps.⁹ For instance, the ASCII format (which CLECs can receive via Web access, CD ROM or diskette) can be loaded into spreadsheet programs such as Microsoft Excel or Lotus 1-2-3 or database applications, such as Microsoft Access. An example of an ASCII bill that has been loaded into Excel by one of Qwest's customers is provided at Attachment 12. The EDI bill is compatible with commercially available software packages built to process EDI billing and can also be downloaded into the spreadsheet or database programs set forth above and merged with electronic CSR data. This process is described in Attachment 13.

The BOS format, which is typically accompanied by the CSR, provides an auditable level of detail on the bill. Attachment 4 and Attachment 5 contain an example of a BOS bill and BOS CSR, respectively.¹⁰ Attachment 5 is the BOS-related component for the same account as is provided in Attachment 3. It lists every USOC with all the detail associated with the CSR, including additional information not required for bill validation (e.g., non-billable USOCs, non-rate-affecting FID information). The USOCs, which are listed in the "Code" column, together with the telephone number (which follow the "TN" entries throughout

⁹ See *id.* at ¶ 498 (identifying the various electronic formats available to CLECs for receiving CRIS bills). Although we have attached a paper version of the Summary Bill to this letter, the electronic version of BOS bills with Customer Service Records ("CSRs") provide the same information. CLECs that receive bills electronically can identify all the services billed and compare them to their expected results.

¹⁰ All BOS Bill examples are from Telcordia Technologies, SR 1871, CABS Billing Output Specifications, Volume 2 Service Exhibits. Issue 5, Revision 2, February 2002.

the CSR) are important for bill validation. The rate for each USOC, also important, is near the right hand side, near the bottom of each USOC's entry. To illustrate, in Attachment 5, the first USOC with a rate on this CSR is the U5R USOC that has a rate of \$34.22. This is for telephone number 303-555-9991. This telephone number also has a PORXX USOC that bills \$0.43. The USOCs for this line total \$34.65. Telephone numbers 303-555-9992 and 303-555-9993 follow with the same billable USOCs totaling \$34.65. The charges for these three telephone numbers total \$103.95 on this account.

2. Non-Recurring and Fractional Charges

Qwest's CRIS and BOS bill formats provide fractional and non-recurring charges at a sub-account level. For CRIS bill formats, this information is provided in the "Service Addition and Changes" section (Attachment 6). The BOS bill provides this information in the "Other Charges and Credits" section (Attachment 7).

A side-by-side comparison of the two bills demonstrates that the audit-affecting information is the same:¹¹

- The service order number for the change;
- The purchase order number (PON) from the CLEC's LSR;
- The service dates of the activity;
- The involved USOCs and their descriptions; and
- The net amount of the charge for the service order.

The presence of these items enables CLECs to audit the charges and verify that they are being billed accurately. To validate that these charges are correct, the CLEC would match the service order or PON number to its service records. The CLEC then would confirm that the service dates and USOCs are correct, and could validate the net amount billed by comparing the amount billed to its expected results.

3. Usage Charges

The third major type of charges on a bill is usage charges. Qwest's CRIS bill format summarizes categorized usage at a telephone number level rather than the CLLI Code level. This can be seen on Attachment 3. Providing usage charges at the telephone number level allows CLECs to validate the usage against the DUF records.

The local usage on Qwest's CRIS bill format is broken down into the two categories (MOU and Shared Transport) that affect the usage's rating. Qwest also

¹¹ Qwest's CRIS bill format also provides the monthly rate associated with the USOCs added or removed with the order activity, information the BOS bill lacks.

provides call-by-call detail for all Qwest intraLATA toll calls and pay-per-use features, such as Last Call Return or Continuous Redial, that bill to the CLEC. Qwest provides this usage data to CLECs with the identical level of detail that Qwest provides to its Retail customers.

The BOS billing format provides summarized usage billing pursuant to industry guidelines. Attachment 8 reflects the content of the BOS usage billing. On the BOS bill, local switching usage is summarized at a Central Office CLLI Code level and broken down into categories similar to those on the CRIS bill format (MOU and Shared Transport).

4. Other Information

Qwest's CRIS and BOS bill formats also contain additional summary level information on payments and adjustments included in the summary bill. Attachment 9 shows an example of this in a CRIS bill format. Attachment 10 shows the comparable information for a BOS bill format.

C. KPMG's Third Party Test Confirms That Qwest's Wholesale Bills Are Auditable

KPMG's testimony in connection with its Third Party Test confirms that Qwest's CRIS format bills are auditable. First, KPMG has acknowledged that the very fact that it was able to conclude that Qwest's bills are accurate demonstrates that KPMG, and therefore presumably CLECs, could audit the bills.¹² This also was confirmed in the Vendor Technical Conference¹³ and subsequent state proceedings.¹⁴

¹² See Application at Attachment 5, Appendix K, Testimony of Michael W. Weeks, Colorado Public Utilities Commission Proceeding, Docket No. 02M-260T, June 10, 2002, at 168 ("We validated the accuracy of [W]holesale bills delivered to the pseudo CLEC. . . . I think it speaks for itself, that, in fact, we did audit bills, so one could infer that they are auditable.").

¹³ See Application at Attachment 5, Appendix G, Testimony of Liz Fuccillo, ROC OSS Technical Vendor Conference No. 3, May 14, 2002 ("Q: [S]o a CLEC would be able to look at the resale bill and track calls made, through the DUF onto the bill, on a call by call basis. A: Yes. Q: But on a UNE-P bill it would not be able to do that; is that correct. A: [Y]ou could do it if we did it. And what you would have to do is add up the minutes of the use, apply the business rules and compare it to your bill."). For your convenience, a copy of the relevant pages of Ms. Fuccillo's testimony is included as Attachment 11.

¹⁴ See, e.g., Testimony of Joe Della Torre, Qwest Corporation's Section 271 Application and Motion for Alternative Procedure to Manage the Section 271 Process, Utility Case No. 3269, July 1, 2002, at 121-22 ("The fact that we had to audit the bills in order to offer an opinion on their accuracy I think demonstrates that they are auditable"); Testimony of Michael W. Weeks and Joe Della Torre, Washington Utilities and Transportation Commission Hearing, Docket No. UT-003022, UT-003040, Volume LVII, June 5, 2002, at 8090 ("We looked to determine whether the charge that appeared on the bill was appropriate and consistent with whatever tariffs or whatever rating mechanism controlled that particular line item. . . . [T]he design of the test was such that we knew in advance what charges should and should not appear on the bill and looked for both types of cases in the sense that if we expected a particular

KPMG's Final Report attests to the auditability of Qwest's bills. Test 20 evaluated in part the accuracy of Qwest's Wholesale bills.¹⁵ KPMG evaluated Qwest's performance on a total of 27 Test Points as satisfactory.¹⁶ In addition, for those Test Points that Qwest initially did not receive a satisfactory rating, KPMG closed/resolved all Exceptions and Observations relating to billing accuracy.¹⁷

Finally, although KPMG's Third Party Test did not examine specifically Qwest's offering of BOS format bills, because the CRIS format and BOS format bills provide the same information and come from the same data source, the two formats are equally auditable.

nonrecurring charge and it wasn't there, we would have raised that as an issue. And if we saw charges on the bill that we didn't understand the origin of, we would have investigated that as well.").

¹⁵ See OSS Declaration at ¶ 588.

¹⁶ See *id.* at ¶ 589.

¹⁷ See *id.* at ¶ 590 n.850 (listing the Exceptions and Observations).

Attachment 1

Notification of BOS format availability to CLECs



Announcement Date:	April 19, 2002
Effective Date:	Immediately
Document Number:	SYST.04.19.02.F.04033.IABS_R85_DftTechSpec
Notification Category:	Systems Notification
Target Audience:	CLECs, Resellers
Subject:	IABS Release 85 – Draft Technical Specifications
Associated CR #:	SCR090601

Summary of Change:

Qwest will be supplying an additional option to have your UNE P bill and CSR data provided in the CABS/BOS format.

Qwest will be following TRG, CABS/BOS recommendations for implementation and population of the CABS/BOS records. The BOS Version being used at production will be Version 37. Information related to the CABS/BOS record format can be obtained from Telcordia at <http://www.telcordia.com/>

Comment Cycle:

Qwest is making this change to conform to Industry Standards. Therefore, there will be no documentation posted to the document review site. Please submit any comments on the timeline presented on this notification to Qwest via the following link: <http://www.qwest.com/wholesale/cmp/comment.html>. Fill in all required fields and be sure to reference the Notification Number listed above.

Timeline:

CLEC Comment Cycle begins	Details for providing comments are provided above	Available April 19, 2002
Qwest/CLEC Walk Through	Walk Through to provide an informational overview and answer CLEC questions. All relevant Qwest SMEs will be in attendance and CLEC SMEs are encouraged to participate.	1:00 -3:00 P.M. MDT, May 1, 2002 Conference Bridge: 888-725-8686 Conference ID : 1957586
CLEC Comment Cycle ends		5:00 p.m. MT, May 7, 2002
Final Notification issued		Available May 17, 2002
CLEC Testing Window Begins	Qwest will provide a test file and Differences List 30 days prior to the production installation.	Available June 1, 2002
Targeted Production Date		Available July 1, 2002

Sincerely,

Qwest

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

Attachment 2

“Summary of Services” Section of Summary Bill



For questions, call 1-800-559-0634

XX Solutions Co.

Bill Date: Jun 13, 2002

Account No: K-303-111- 5678-901M

Summary Bill

Page 6

SUMMARY OF SERVICES

QUANTITY	SERVICES	CODE
73	ANONYMOUS CALLER REJECTION	AYK
36	DIRECTORY LISTING	CLT
3	3-WAY CALL TRANSFER	EQ3
37	3-WAY CALLING	ESC
55	CALL FORWARDING	ESM
39	CALL WAITING	ESX
1	CALL FORWARDING-BUSY LINE	EVB
2	CALL FORWARDING-DONT ANSWER	EVDHG
2	CALL FWD-BUSY LINE/DONT ANSW	EVF
43	CALL FORWARDING-BUSY LINE	EVO
12	30 NUMBER SPEED CALLING	E3D
10	8 NUMBER SPEED CALLING	E8C
12	ADDITIONAL LISTING IN ANOTHER DIRECTORY	FAL
4	CALL FORWARDING SERVICE	FBJ
1	CALL FORWARDING SERVICE	FDJ
4	CALL FORWARDING SERVICE	FVJ
7	CALL TRACE BLOCKING	HBG
14	CONTINUOUS REDIAL BLOCKING	HBQ
8	LAST CALL RETURN BLOCKING	HBS
117	HUNTING FEATURE	HTG
506	COLORADO OFFSET - SERVICE	LAWPA
7	PROVIDER NUMBER PORTABILITY	NCE
4	SELECTIVE CALL FORWARDING	NKM
1	CALLER ID BLOCKING - PER LINE	NLT
67	NONLIST SERVICE	NNK
1	CALLER IDENTIFICATION	NPP
14	RESTORAL CHARGE	NPU
14	NON-PUBLISHED SERVICE	NP3
14	NON-PUBLISHED SERVICE AT NO CHARGE	NSK
16	PRIORITY CALL	NSQ
38	LAST CALL RETURN	NSS
36	CONTINUOUS REDIAL	NSY
19	CALL REJECTION	NWT
5	CALL ID ON CALL WAITING	PORXX
506	FEDERAL CHARGE - SERVICE	RNCEP
1	PROVIDER NUMBER PORTABILITY	RTVXN
1	EASY NUMBER	RTVXQ
58	RESTRICTION OF 876 CALLS	RTVXY
1	BILLED NUMBER SCREENING	RTY
1	10XXX DIRECT DIALED BLOCKING	UHR
2	LONG DISTANCE RESTRICTION	USR
208	REBUNDLE SWITCHING & LOOP CLASS OF SERVICE	USRAX
208	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, PRIMARY	ZCB1X
295	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL	3BL
51	DISTANCE CHARGE	
7	3 WAY CALLING BLOCKING	

Attachment 3

“Itemized Service” Section of Summary Bill

QWEST RESALE/INTERCONNECT

For questions, call 1-800-555-0634

XX Solutions Co.
 Bill Date. Jun 13, 2002
 Account No. 303-555-9991-2408

• ITEMIZED SERVICE

1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL DEAVERAGED RATE ZONE 3	34 22
1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL DEAVERAGED RATE ZONE 3	34 22
1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, PRIMARY DEAVERAGED RATE ZONE 3	34.22
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY	43
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY	43
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY	43
	TOTAL	103.95

ACCOUNT DETAIL

MONTHLY SERVICE CHARGES	103.95
SERVICE ADDITIONS AND CHANGES	.00
INTERCONNECTION USAGE	.48
ITEMIZED CALLS	.00
PAY-PER USE FEATURES	.51
QWEST RESALE/INTERCONNECT TOTAL	\$104.94

MONTHLY SERVICE - JUN 13 THRU JUL 12 103.95
 QWEST RESALE/INTERCONNECT SUBTOTAL OF MONTHLY SERVICE CHARGES 5103.95

• INTERCONNECTION USAGE

LOCAL ORIGINATING MINUTES OF USE

USAGE FROM:	MINUTES
303 555-9991	15
303 555-9992	54
303 555-9993	187

NUMBER OF MINUTES	RATE PER MINUTE
256	.0018100

SHARED TRANSPORT MINUTES OF USE

FOR YOUR INFORMATION:

303 555-9991	8 MINUTES
303 555-9992	15 MINUTES
303 555-9993	35 MINUTES

NUMBER OF MINUTES	RATE PER MINUTE
58	.0011100

"Other Charges"
 categorized at
 TN level

SUBTOTAL 5.48

• PAY-PER-USE SERVICES

1 JUN 04 12:05P LAST CALL RETURN ACTIVATION

SUBTOTAL 51
 .51

Attachment 4

Excerpt from Telcordia's
Guidelines for the BOS
paper bill format

BILL NO 203 J00-0200 976
INVOICE NO JC000300976-98359
BILL DATE DEC 15, 1998
PAGE 1

ULEC CARRIER
ATTN UNBUNDLER
17 ANYWHERE LANE
ANY TOWN, NY 20102

BILLING AND ORDERING INQUIRIES, CALL (203) 694-7091

FOR TELCO USE:
ICSC OFC 93 A

SWITCHED ACCESS SERVICE
UNBUNDLED LINE PORT

* * * BALANCE DUE INFORMATION * * *

TOTAL AMOUNT OF LAST BILL		241.89
PAYMENTS APPLIED - SEE DETAIL		236.14CR
ADJUSTMENTS APPLIED - SEE DETAIL		5.75CR
LOCAL	\$ 75CR	
ZERO BALANCE DUE.		0.00

* * * DETAIL OF CURRENT CHARGES * * *

TOTAL - CONNECTICUT		
--		
MONTHLY CHARGES FROM DEC 25 THRU JAN 24		10.16
LOCAL	10.16	
OTHER CHARGES AND CREDITS - SEE DETAIL		6.92
INTERSTATE	2.60	
INTRASTATE	2.60	
LOCAL	1.72	
USAGE CHARGES - SEE DETAIL		2,638.15
LOCAL	2,638.15	

TOTAL CURRENT CHARGES * DUE BY JAN 26 *		2,655.23

TOTAL AMOUNT DUE 2,655.23

Attachment 5

Sample BOS CSR

CUSTOMER SERVICE RECORD
(CSR) 303 555-9991 240
07-03-02

PAGE 1

BILLING INQUIRIES CALL CLS SVC BILL DAY ACCT DATE FOR TELCO USE
(800) 335-5672 UHR 1ST 07-01-02 033

---ACCOUNT IDENTIFICATION---

FOR TELCO USE: ACNA XXX LAT 658 TAR 1726 TAX B, D, J, H
PIU 100
MCN XXXMC00XXXXX

BILLED TO: XX SOLUTIONS
1500 4TH AVE RM:101
SEATTLE WA 98101

CUSTOMER SERVICE ADDRESSES: XX LLC
1-1708 E PIKE, MANITOBA, CO
1-MTNBC000000
2-1122 3D AVE, COLORADO SPGS, CO
2-CLSPC000000

---SERVICE AND FEATURES---

*USOC
column*

SVC	ESTBL	QTY	CODE	DESCRIPTION	TAX	AMOUNT	ACTVTY	DATE
	062701	1	UHR	/ZCID N16				
050102								
	062701		TN	303 555-9991				
062701				/PICC 0555				
				/LPIC 0555				
				/NMC				
				/LCC LMB				
	062701	1	USR	/ZCID N16				
062701				/RTZ 2				
				/TN 303 555-9991				
				/PIC 0555				
				/LPIC 0555				
				/NMC				
				/LCC LMB				
				LOCAL 100% X	1 X	34.22		34.22
	062701	1	EVF	/ZCID N16				
				/TN 303 555-9991				
				/CFN 555-9993				
				/RCYC 3				
	062701	2	LAWPA	/ZCID N16				
062701								
				/TN 303 555-9991				
	062701	2	PORXX	/ZCID N16				
062701								
				/TN 303 555-9991				
				LOCAL 100% X	1 X	.43		
.43								
				LOCAL SUBTOTAL		34.65		
				TN SUBTOTAL		34.65		

*Telephone
Number*

*USOC
rate*

062701		TN	303 555-9992		
062701			/PICC 0555		
			/LPIC 0555		
			/NMC		
			/LCC LMB		
062701	1		USRAX/ZCID N16		
062701			/RTZ 2		
			/TN 303 555-9992		
			/PIC 0555		
			/LPIC 0555		
			/NMC		
			/LCC LMB		
			LOCAL 100% X	1 X	34.22
34.22					
062701	2		LAWPA/ZCID N16		
062701			/TN 303 555-9992		
062701	2		PORXX/ZCID N16		
062701			/TN 303 555-9992		
			LOCAL 100% X	1 X	.43
.43					
			LOCAL SUBTOTAL		34.65
			TN SUBTOTAL		34.65
062701		TN	303 555-9993		
062701			/PIC 0555		
			/LPIC 0555		
			/NMC		
			/LCC LMB		
062701	1		USRAX/ZCID N16		
062701			/RTZ 2		
			/TN 303 555-9993		
			/PIC 0555		
			/LPIC 0555		
			/NMC		
			/LCC LMB		
			LOCAL 100% X	1 X	34.22
34.22					
062701	1	EVO	/ZCID N16		
			/TN 303 555-9993		
			/CFNB 555-9991		
			/DES HTG TO 555-9991		
062701	2		LAWPA/ZCID N16		
062701			/TN 303 555-9993		
062701	2		PORXX/ZCID N16		
062701			/TN 303 555-9993		
			LOCAL 100% X	1 X	.43
.43					

LOCAL SUBTOTAL
TN SUBTOTAL
ACCOUNT TOTAL

34.65
34.65
103.95

total

---SUMMARY---

ACTIVITY LEGEND

* - SERVICE ORDER ACTIVITY
D - REMOVAL EQUIPMENT
R - RATE CHANGE
Z - ZONE CHANGE
M - MISCELLANEOUS
P - JURISDICTIONAL FACTOR CHANGE
B - BIP CHANGE

TAX LEGEND

TYPE	APPLICABLE CODE	EXEMPT CODE
FEDERAL	1	B
STATE	2	C
CITY	3	D
COUNTY	4	E
STATE SALES	5	J
EXCISE TAX	6	G
FED UNV SF	7	F
UNVRSL SVC	9	K

CUSTOMER SERVICE RECORD

(CSR) 719 555-9991 991

07-03-02

PAGE

2

XX LLC

---SUMMARY---

ENGLISH LANGUAGE GLOSSARY

ACNA ACCESS CUSTOMER NAME ABBREVIATION
ACTL ACCESS CUSTOMER TERMINAL LOCATION
EVF CALL FWD-BUSY LINE/DON'T ANSW
EVO CALL FORWARDING-BUSY LINE
LAWPA PROVIDER NUMBER PORTABILITY
PORXX PROVIDER NUMBER PORTABILITY
TN TELEPHONE NUMBER
UHR SERVICE AND/OR EQUIPMENT
USR ANALOG LINE SIDE PORT, PRIMARY MEASURED LINE
2 WIRE LOOP
USRAX ANALOG LINE SIDE PORT, ADDL